

1 DANIEL J. BERGESON, Bar No. 105439  
2 [dbergeson@be-law.com](mailto:dbergeson@be-law.com)  
3 JOHN W. FOWLER, Bar No. 037463  
4 [jfowler@be-law.com](mailto:jfowler@be-law.com)  
5 MELINDA M. MORTON, Bar No. 209373  
6 [mmorton@be-law.com](mailto:mmorton@be-law.com)  
7 BERGESON, LLP  
8 303 Almaden Boulevard, Suite 500  
9 San Jose, CA 95110-2712  
10 Telephone: (408) 291-6200  
11 Facsimile: (408) 297-6000

12 Attorneys for Plaintiff and Counter-Defendant  
13 VERIGY US, INC.

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 SAN JOSE DIVISION

17 VERIGY US, INC, a Delaware Corporation,

18 Plaintiff,

19 vs.

20 ROMI OMAR MAYDER, an individual;  
21 WESLEY MAYDER, an individual; SILICON  
22 TEST SYSTEMS, INC., a California Corporation;  
23 and SILICON TEST SOLUTIONS, LLC, a  
24 California Limited Liability Corporation,  
25 inclusive,

26 Defendants.

27 AND RELATED COUNTERCLAIMS.

Case No. C07-04330 RMW (HRL)

**VERIGY US, INC.'S ANSWER TO  
COUNTERCLAIMS**

Complaint Filed: August 22, 2007  
Trial Date: None Set

1 Plaintiff and counter-defendant Verigy US, Inc. (“Verigy”), hereby answers the  
 2 counterclaims brought against it by defendants and counter-claimants Silicon Test System, Inc.  
 3 and Silicon Test Solutions, LLC, Romi Omar Mayder (“Mayder”), and Wesley Mayder  
 4 (collectively, “defendants”).

### 5 **GENERAL ALLEGATIONS**

- 6 1. On information and belief, Verigy admits the allegations of Paragraph 1.
- 7 2. On information and belief, Verigy admits the allegations of Paragraph 2.
- 8 3. On information and belief, Verigy admits the allegations of Paragraph 3.
- 9 4. On information and belief, Verigy admits the allegations of Paragraph 4.
- 10 5. Admitted.
- 11 6. Admitted.
- 12 7. Admitted.
- 13 8. Admitted.
- 14 9. Admitted.

### 15 **FIRST COUNTERCLAIM**

- 16 10. The responses in paragraphs 1-9 are repeated as though fully set forth herein.
- 17 11. Verigy admits that it filed a complaint alleging misappropriation of trade secrets  
 18 against defendants and that Verigy has filed a trade secret disclosure. Except as expressly  
 19 admitted herein, Verigy denies each and every remaining allegation contained in Paragraph 11.
- 20 12. Admitted.
- 21 13. Verigy admits that defendants seek a declaration as set forth in paragraph 13 of their  
 22 counterclaims. Except as expressly admitted herein, Verigy denies each and every remaining  
 23 allegation contained in Paragraph 13.

### 24 **SECOND COUNTERCLAIM**

- 25 14. The responses in paragraph 1-13 are repeated as though fully set forth herein.
- 26 15. Admitted.
- 27 16. Admitted.
- 28 17. Verigy admits that defendants seek a declaration as set forth in paragraph 13 of their

1 counterclaims. Except as expressly admitted herein, Verigy denies each and every remaining  
2 allegation contained in Paragraph 17.

3 **THIRD COUNTERCLAIM**

4 18. The responses in paragraphs 1-17 are repeated as though fully set forth herein.

5 19. Admitted.

6 20. Admitted.

7 21. Verigy admits that defendants seek a declaration as set forth in paragraph 13 of their  
8 counterclaims. Except as expressly admitted herein, Verigy denies each and every remaining  
9 allegation contained in Paragraph 21.

10 **PRAYER**

11 Verigy denies that defendants are entitled to any of the relief for which they pray as to any  
12 cause of action.

13 Verigy instead prays for judgment of dismissal of defendants' counterclaims as well as for  
14 relief as set forth in Verigy's Complaint.

15  
16 Dated: October 3, 2007

BERGESON, LLP

17  
18 By: \_\_\_\_\_/s/  
19 Melinda Morton

20 Attorneys for Plaintiff and Counter-defendant  
21 VERIGY US, INC.  
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